

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

Robertson, Anschutz, Schneid & Crane LLC
Attorneys for Secured Creditor
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Laura Egerman, Esq. (LE-8250)

In Re:

GEORGE SARIOTIS,

Debtor.

Case No.: 19-32528-MBK

Chapter: 11

Hearing Date: August 20, 2020

Judge: Michael B. Kaplan

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:

AUGUST 20, 2020 at 10:00 A.M.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor-</i> George Sariotis 1801 Pitney St Oakhurst, NJ 07755-2840	<i>Debtor's Attorney-</i> Timothy P. Neumann Broege, Neumann, Fischer & Shaver 25 Abe Voorhees Drive Manasquan, NJ 08736	<i>U.S. Trustee's Attorney-</i> Lauren Bielskie DOJ-Ust One Newark Center Suite 2100 Newark, NJ 07102
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PLEASE TAKE NOTICE that on **August 20, 2020**, at **10:00a.m.**, or as soon thereafter as counsel may be heard, Robertson, Anschutz, Schneid & Crane, LLC, attorneys for SELENE FINANCE LP, the within creditor ("Creditor"), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at 402 East State Street Trenton, N.J. 08608 Courtroom #8, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic

stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT**, 402 East State Street Trenton, N.J. 08608 Courtroom #8, and simultaneously served on Secured Creditor's counsel, RAS Crane LLC, Attorneys for Secured Creditor 10700 Abbott's Bridge Rd., Suite 170 Duluth, GA 30097, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: July 23, 2020

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